

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

EXPERIMENTAL RATE AND SERVICE CHANGES
TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT
WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CRUM
TO INTERROGATORY OF AMERICAN BANKERS ASSOCIATION AND
REQUEST FOR PRODUCTION OF DOCUMENTS
(ABA/USPS-T3-1)

The United States Postal Service hereby provides its response to the
following interrogatory and request for production of documents of American
Bankers Association: ABA/USPS-T3-1, filed on November 13.2002.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 25, 2002

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CRUM
TO INTERROGATORY OF AMERICAN BANKERS ASSOCIATION AND
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ABA/USPS-T3-1. In your response to interrogatory OCA/USPS-T3-7, you confirm that the weighted cost per piece for physical returns is \$0.5347.

- (a) What is the corresponding cost per piece for mail that is forwarded?
- (b) Identify and to the extent possible quantify all mail piece characteristics, *e.g.*, weight, presortation, prebarcoding, shape, *etc.*, which affect the cost per piece of (a) forwarding or (b) physically returning mail.
- (c) How are these costs affected by these characteristics, *e.g.*, how much more does it cost to both (a) forward or (b) return a two-ounce letter compared to a one-ounce letter.

RESPONSE:

- (a) The USPS average forwarding costs of \$0.307 are presented in Table 5.1.1 of USPS/LR-J-69.
- (b)–(c) The impact on forwarding and return costs of various mail piece characteristics has not been studied.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

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